

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major Draft Permit Renewal No. F-03-034

MID PARK, INC.

CLARKSON, KENTUCKY

November 14, 2003

WILSON TAN, REVIEWER

Plant I.D. # 21-085-00033

Application Log # 55777

SOURCE DESCRIPTION:

Mid-Park, Inc., an existing conditional major source (for VOC and HAP) submitted a permit modification to its existing O-93-045 permit.

Mid-Park, Inc. is a manufacturer of highway related metal products, where the main production is sign post holders.

COMMENTS:

The permit modification incorporated a few changes:

- 1) Emission Point 01 (A,B,C,D,E,F,G,H,J) – 9 MIG Welders:
 - i) Addition of 5 MIG welders since the last permit (O-93-045).
 - ii) Applicable regulations, requirements and descriptions have been updated in the latest permit.
 - iii) No control equipment.

- 2) Emission Point 02 (4A & 4B) – 2 Dip Tanks:
 - i) One dip tank has been removed since the last permit (O-93-045).
 - ii) Applicable regulations, requirements and descriptions have been updated in the latest permit.
 - iii) No control equipment.

EMISSION AND OPERATING CAPS DESCRIPTION:

- i) The source requested limitation on the hours of operation. Hours of operation shall be limited so as not to exceed the emission limitations specified in the latest permit.
- ii) Plant-wide 12-month rolling emission of Volatile Organic Compound (VOC) shall not exceed 90 tons/yr, to preclude Major Source applicability.
- iii) Plant-wide 12-month rolling emission of total individual HAP shall not exceed 9 tons per year, to preclude Major Source applicability.
- iv) Plant-wide 12-month rolling emission of total combined HAP shall not exceed 22.5 tons per year, to preclude Major Source applicability.
- v) 2-butoxyethanol emissions shall not exceed 16.68 lbs/hr.
- vi) Xylene emissions shall not exceed 29.95 lbs/hr.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.